

EXHIBIT C

Joseph Calandrelli

From: Joseph Calandrelli
Sent: Thursday, August 21, 2014 8:50 AM
To: 'Bob Carp'
Cc: Sean Carnathan
Subject: RE: DiLorenzos

Bob,

Thank you for getting back to me and I'm glad to hear your daughter is recovering well.

As for the deposition, I respectfully don't see how the DiLorenzos can legitimately oppose being called to testify as witnesses in a case that stems directly from their own actions. Whether or not Ms. Walsh can add them as party defendants, they still have an obligation to testify as to what they know. It would seem to me that the grounds of your anticipated opposition would be more appropriate for opposing any motion to amend to add them as defendants rather than seeking for them to avoid testifying as witnesses. Privileged documents may be a different issue, which I would be happy to discuss with you in more detail if you wish.

Because the DiLorenzos have not provided me with dates for their deposition, I am going to reissue subpoenas today with dates that work for me. I sincerely hope that the DiLorenzos reconsider their position and, for the reasons explained above, avoid having to go to court to resolve what is, in my opinion, a frivolous motion. Please inform the DiLorenzos that if we are forced to go to court, we will be seeking to recover the fees incurred in securing the DiLorenzos' appearance.

Thank you,

Joe

Joseph P. Calandrelli
O'Connor, Carnathan & Mack, LLC
Landmark One
1 Van de Graaff Dr., Suite 104
Burlington, MA 01803
Direct Line: 781-359-9034
Main Number: 781-359-9000
Fax: 781-359-9001
www.ocmlaw.net

From: bobcarp522@gmail.com [<mailto:bobcarp522@gmail.com>] **On Behalf Of** Bob Carp
Sent: Wednesday, August 20, 2014 1:07 PM
To: Joseph Calandrelli
Subject: Re: DiLorenzos

Joe,

First my apologies for the delay in answering your request. My daughter went through major surgery a month ago, and I have been pretty much at her side through all of it. Thank God she is recovering well.

I have had conversations with the DiLorenzos and with their previous counsel, Peter Belotti. Without trying to complicate matters, our obvious fear is that TelTech will try to include them as defendants. However, Ms. Walsh is prohibited from doing so because of the release she signed. Consequently, we will oppose the deposition and request a protective order on documents we consider privileged.

Once again, my apologies for the delay.

Respectfully,
Bob Carp

Robert H. Carp, Esq.
Enrolled Agent with the IRS #00104451-EA

Cottens and Carp, LLC.
COUNSELLORS AT LAW
1215 Chestnut Street
Newton, MA 02464
TEL: 617-861-4529
FAX: 866-723-8737

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On Mon, Aug 18, 2014 at 3:29 PM, Joseph Calandrelli <jcalandrelli@ocmlaw.net> wrote:

Bob,

I have not yet heard back from you on this. Please let me know when your clients are available for a deposition.

Joe

Joseph P. Calandrelli

O'Connor, Carnathan & Mack, LLC

Landmark One

1 Van de Graaff Dr., Suite 104

Burlington, MA 01803

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Main Number: 781-359-9000

Fax: 781-359-9001

www.ocmlaw.net

From: Joseph Calandrelli

Sent: Tuesday, August 12, 2014 5:07 PM

To: 'bobcarp522@gmail.com'

Cc: 'Reilinglaw'; William Hartzell; Sean Carnathan

Subject: DiLorenzos

Hi Bob,

I've been working with Sean on this matter and need to get the DiLorenzos' depositions back on the calendar. Can you please let me know when your clients are available over the next few weeks? Please reply to all as I will need to coordinate with plaintiff's counsel, Richard Reiling.

Thank you,

Joe

Joseph P. Calandrelli

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